

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

Latasha Holloway, *et al.*,

Plaintiffs,

v.

City of Virginia Beach, *et al.*,

Defendants

Civil Action No. 2:18-cv-0069

**PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

PLAINTIFFS' EXHIBIT 36

Deposition Transcript of Virginia Beach City Council Member James Wood



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Transcript of James Wood

Date: September 9, 2019

Case: Holloway, et al. -v- City of Virginia Beach, et al.

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

-----x
LATASHA HOLLOWAY and :
GEORGIA ALLEN, :
Plaintiffs, : CASE NO.
v. : 2:18cv00069
CITY OF VIRGINIA BEACH, et al., :
Defendants. :
-----x

Deposition of JAMES L. WOOD
Virginia Beach, Virginia
Monday, September 9, 2019
10:10 a.m.

Job No. 261322

Pages 1 - 80

Reported by: Penny C. Wile, RPR, RMR, CRR

Transcript of James Wood
Conducted on September 9, 2019

2

1 Deposition of JAMES L. WOOD, held at the
2 offices of:

3

4

5

VIRGINIA BEACH CITY ATTORNEY

6

2401 Courthouse Drive

7

Municipal Center, Building One

8

Room 260

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Virginia Beach, VA 23456

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(757) 385-4351

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Pursuant to Notice, before Penny C. Wile,
RPR, RMR, CRR, Notary Public of the Commonwealth
of Virginia.

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A P P E A R A N C E S

2

ON BEHALF OF THE PLAINTIFFS, LATASHA HOLLOWAY

3

AND GEORGIA ALLEN:

4

J. GERALD HEBERT, ESQUIRE

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ON BEHALF OF THE DEFENDANTS, CITY OF VIRGINIA

13

BEACH, ET AL.:

14

CHRISTOPHER S. BOYNTON, ESQUIRE

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Transcript of James Wood
Conducted on September 9, 2019

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1 P R O C E E D I N G S

2 Whereupon,

3 JAMES L. WOOD,

4 after having been first duly sworn, was examined
5 and did testify under oath as follows:

6 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS:

7 BY MR. LAMAR:

8 Q. Good morning, Mr. Wood. My name is Chris
9 Lamar, and I'm counsel for plaintiffs.

10 MR. HEBERT: I'm Gerry Hebert.

11 Q. So I'm going to be asking you some
12 questions today. Before I do, I wanted to ask if
13 you've ever been deposed before?

14 A. I have.

15 Q. When you were deposed, were those in cases
16 related to voting rights litigation?

17 A. No.

18 Q. Were they cases related to racial
19 discrimination?

20 A. No.

21 Q. I'll, also, go over a few ground rules
22 before we start.

Transcript of James Wood
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1 So the court reporter is transcribing
2 everything that we say. So the court reporter is
3 able to get everything that we say, I want you to
4 be able to give me a chance to get my question
5 out, and I will, also, give you the opportunity to
6 answer the question so we're not talking over each
7 other.

8 The court reporter can only record verbal
9 responses, so it's important to say -- to respond
10 to questions with either a yes or a no or any
11 other response that you deem appropriate.

12 We can take a break at any time. My only
13 request is that we don't take a break while a
14 question is pending.

15 Could you please state your full name for
16 the record?

17 A. James L. Wood.

18 Q. And, for the record, what is your race?

19 A. White.

20 Q. Do you understand that you are under oath
21 today?

22 A. I do.

Transcript of James Wood
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1 Q. Is there any reason that you cannot give
2 truthful answers to my questions today?

3 A. No.

4 Q. When did you first learn about this
5 lawsuit?

6 A. I don't recall.

7 Q. Okay. So I'm going to ask you a few
8 questions about your deposition preparation. But
9 before we get into those questions, I want to make
10 sure that I make it clear that I'm not asking
11 about conversations between you and the City
12 Attorney's office, like no attorney-client
13 conversations or any kind of information in that
14 regard. Okay?

15 A. Okay.

16 Q. What did you do to prepare for this
17 deposition?

18 A. Met with the City Attorney.

19 Q. Did you meet with anyone else?

20 A. No.

21 Q. Who else was present at the meeting?

22 A. Let me back up. I did not meet with the

Transcript of James Wood
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1 City Attorney. I met with Chris Boynton.

2 Q. Okay.

3 A. And he was the only one present at the
4 meeting.

5 Q. Did you review any documents at that
6 meeting?

7 A. Yes.

8 Q. Did you take any notes at that meeting?

9 A. No.

10 Q. Did you discuss your deposition with any
11 of the other members of the Virginia Beach City
12 Council?

13 A. Yes.

14 Q. Who did you discuss the deposition with?

15 A. I don't recall.

16 Q. Did you discuss the deposition with former
17 City Manager Dave Hansen?

18 A. No.

19 Q. Were there any other meetings -- besides
20 the meetings with legal counsel, were there any
21 other meetings that you had to prepare for this
22 meeting?

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1 A. No.

2 MR. BOYNTON: For this deposition? You
3 said --

4 MR. LAMAR: Yeah. For this deposition.
5 I'm sorry.

6 Thanks, Chris.

7 A. The answer is still no.

8 Q. That's fine.

9 Did you have any other conversations with
10 anyone else to prepare for this deposition?

11 A. No.

12 Q. Phone conversations?

13 A. To prepare for the deposition, no.

14 Q. Did you review any documents in
15 preparation for this deposition, outside of
16 attorney-client communications?

17 A. Outside of attorney-client? Yes.

18 Q. What documents?

19 A. The documents I produced for the subpoena.

20 Q. The Rule 45 subpoena.

21 How long do you think you spent preparing
22 for this deposition?

Transcript of James Wood
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1 MR. BOYNTON: Are you asking him outside
2 of his time with counsel?

3 MR. LAMAR: Yes.

4 A. Outside of my time with counsel?

5 Q. Yes.

6 A. No time.

7 Q. Did you receive a subpoena to bring
8 certain documents with you today?

9 A. No.

10 Q. Did you bring any documents with you to
11 this deposition?

12 A. No.

13 Q. Did you read the subpoena attachment?

14 A. What is a subpoena attachment?

15 Q. So the subpoena attachment is the Rule 45
16 subpoena that we were discussing earlier, the one
17 you said you reviewed. So there is a subpoena,
18 and there was an attachment that came along with
19 the subpoena.

20 A. Are you asking me did I read my responses
21 or did I read what you sent?

22 Q. Did you read what we sent?

Transcript of James Wood
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1 A. Originally?

2 Q. Uh-huh.

3 A. Yes.

4 Q. All right. Can you tell me what was in
5 it?

6 A. No.

7 Q. Do you intend to testify at trial?

8 MR. BOYNTON: Objection to the question
9 for the basis of work product as to whether he
10 intends to testify at trial. You can ask about
11 his availability, if that's what you were getting
12 at.

13 Q. Is there any reason you could not be in
14 Norfolk, Virginia during the week of January 14th,
15 2020?

16 A. Yes.

17 Q. What are those reasons? Well --

18 A. I'll be happy to tell you.

19 Q. Yeah. Sure.

20 A. My daughter is having a baby in Belgium,
21 so I will be there.

22 Q. Congratulations.

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1 A. Actually, on the 14th.

2 Q. Congratulations.

3 MR. BOYNTON: Assuming everything happens
4 exactly on time, which...

5 Q. That always happens, right?

6 I'm going to move on to your position with
7 the City of Virginia Beach.

8 A. Okay.

9 Q. What is your position with the City of
10 Virginia Beach?

11 A. I am a City Council member representing
12 the Lynnhaven district, and I'm also the Vice
13 Mayor.

14 Q. How long have you held that position?

15 A. Which one?

16 Q. Both.

17 A. City Council member, since July 1st, 2002.
18 Vice Mayor, since May of 2018; I believe May of
19 2018.

20 Q. Before you became Vice Mayor and City
21 Council member, did you hold any other government
22 positions in the City of Virginia Beach?

Transcript of James Wood
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1 A. Yes.

2 Q. What were those positions?

3 A. I was a police officer.

4 Q. Anything else?

5 A. No.

6 Q. Were you a Commissioner for the
7 Transportation District Commission?

8 A. Yes. That is not a city position.

9 Q. Got it.

10 Did you hold any other position with any
11 other city governments?

12 A. No.

13 Q. State government?

14 A. Yes.

15 Q. Was it just the -- was it this
16 Commissioner and Chairman of the Transportation
17 District or were there other positions?

18 A. Joint -- I'm a Commission member on the
19 Joint Committee to Study Recurrent Flooding. And
20 I may have the name juxtaposed a little bit on
21 that committee.

22 Q. How long have you been on that committee?

Transcript of James Wood
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1 A. Three or four years.

2 Q. Any other positions?

3 A. I don't think so. No.

4 Let me go back. Hampton Roads Planning
5 District Commission. I'm a member of that. Just
6 give me a second to think about it as I go
7 through.

8 Q. Yeah. No problem.

9 A. I mentioned HRT, HRTDC. That's the only
10 regional ones I'm involved in.

11 Q. Okay. Are there any statewide positions?

12 A. No.

13 Q. What are your job duties as Vice Mayor?

14 A. So I help prepare the agenda for the
15 meetings, and I take over when the Mayor is
16 unavailable, and I also manage the appointment
17 process.

18 Q. The appointment process. Can you tell me
19 a little bit about that?

20 A. Sure. People who want to serve on various
21 boards and commissions that the Council appoints,
22 I manage that particular part of the process.

Transcript of James Wood
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1 Q. All right. So that the appointment
2 process is primarily for -- to commission, but
3 it's not for, like, City Manager or the
4 constitutional officers?

5 A. No.

6 Q. Okay. So you'd agree that being Vice
7 Mayor and a Council member is a very important
8 position in the City of Virginia Beach, correct?

9 A. I don't really have an opinion on that.

10 Q. How would you compare your position as
11 Vice Mayor to the other Council members? Do you
12 have more responsibilities, less responsibilities?

13 A. More responsibilities.

14 Q. Do you communicate directly with
15 constituents?

16 A. Yes.

17 Q. How so?

18 A. Telephone, email.

19 Q. Do you use text messages also?

20 A. Not a whole lot. Mostly, it's email and
21 telephone.

22 Q. All right. Any other ways, besides phone,

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1 emails, and text messages?

2 A. Occasionally a letter, but...

3 Q. So in your role as Vice Mayor do you work
4 closely with the City Manager?

5 A. Yes.

6 Q. In what ways?

7 A. So the Manager works to prepare the
8 agenda. So there are certain things that the
9 Manager wants to put on the agenda. There are
10 certain things the City Attorney wants to put on
11 the agenda. There are certain things that the
12 other appointees want to put on the agenda. So we
13 work with them to figure out exactly how we're
14 going to plug things in.

15 We work with the Manager to determine the
16 agenda for the goal-setting retreats, recently on
17 the May 31st tragedy, work with them on -- and his
18 staff on communication with media, things like
19 that.

20 Q. So you said the -- so the City Manager
21 prepares the agenda; is that correct?

22 A. City Manager prepares his aspects of the

Transcript of James Wood
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1 agenda, along with the City Clerk and the City
2 Attorney --

3 Q. Got it.

4 A. -- primarily.

5 Q. So the City Manager has an agenda, the
6 City Council has an agenda, and, then, the other
7 constitutional officers have agendas also?

8 A. They aren't constitutional officers.

9 Q. So I just want to make sure I understand
10 correctly what you're saying. So you're saying
11 someone like -- the City Manager has -- they plan
12 their agenda for the things that they're
13 responsible for; is that correct? Would you say
14 that's right?

15 A. I can explain it to you. First off, in
16 Virginia constitutional officers are Sheriff,
17 Commissioner of Revenue, Clerk of the Court, and
18 Treasurer.

19 Q. Okay.

20 A. So those are the four constitutional
21 officers.

22 Q. All right.

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1 A. They're independently elected. They don't
2 report to us. They have nothing to do with us.

3 Q. Okay.

4 A. We have appointees under the
5 Council/Manager form of government. We have five
6 appointees. There are five appointees the Council
7 hires and fires. There is the City Manager, the
8 City Attorney, the City Clerk, the City Real
9 Estate Assessor, and the City Auditor.

10 Q. Got it.

11 A. So when you get past all that, there are
12 meetings every Tuesday. There are voting meetings
13 every other Tuesday. But we meet every Tuesday.
14 So when you -- when we set up an agenda, it's the
15 Wednesday before the following Tuesday when there
16 is a voting meeting also.

17 At that point the City Manager has a list
18 of things that he would like us to go over. The
19 City Attorney has a list of things he would like
20 us to go over. The City Clerk has, typically,
21 some housekeeping items. So all of these things
22 are melded into one agenda that the Council has.

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1 Q. All right. What are the meetings -- the
2 Tuesday meetings where there are no votes, what
3 are those called?

4 A. Workshops.

5 Q. Okay. Do you ever communicate with the
6 City Manager via text message?

7 MR. BOYNTON: I'm going to object to the
8 form of the question since we are in between City
9 Managers right now. I think you can ask him
10 historically what he did with the past City
11 Manager.

12 Q. So to rephrase, did you ever communicate
13 with the former City Manager, Dave Hansen, via
14 text message?

15 A. Yes.

16 Q. Do you know if the way you communicated
17 with former City Manager Dave Hansen is any
18 different from the way that other Council members
19 communicated with former City Manager Dave Hansen?

20 A. I have no idea.

21 Q. Have you been involved in any other
22 litigation in your role as Vice Mayor?

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1 A. In my role as Vice Mayor, no.

2 Q. Have you been involved in any other
3 litigation in your role as a Council member?

4 A. I don't know. I don't know the answer to
5 that. I don't know if -- the city has been
6 involved in a great -- great deal of litigation.
7 And as a member of Council I've, obviously, been
8 involved with what the City Attorney's office
9 does, but I don't know that that is me being
10 directly involved.

11 Q. I was just more so meaning, like, you
12 being directly involved. I'm not talking about,
13 you know, a slip and fall on the sidewalk and the
14 City of Virginia Beach is implicated. I just
15 mean, like, have you participated in any other
16 type of litigation involving the City of Virginia
17 Beach?

18 MR. BOYNTON: I just need to object to the
19 form. I think the key question here is what do
20 you mean by participated. So if you can kind of
21 drill down on what you mean by participated, I'm
22 sure we have an answer.

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1 MR. LAMAR: Sure.

2 Q. Have you been deposed before as part of
3 the litigation in a case involving the City of
4 Virginia Beach?

5 A. Yes.

6 Q. Have you testified in your role as -- have
7 you testified in your role as Council member for a
8 case involving the City of Virginia Beach?

9 A. No.

10 Q. What was the case about that you testified
11 by deposition?

12 A. It was a lifeguard truck hit someone on
13 the beach.

14 MR. BOYNTON: I forgot you got deposed in
15 that.

16 A. I did not.

17 MR. BOYNTON: You did not forget?

18 A. I did not forget that. It was right here
19 (indicating).

20 MR. BOYNTON: Yep.

21 Q. Have you endorsed a candidate running for
22 a seat on the Virginia Beach City Council?

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1 A. Yes.

2 Q. Who?

3 A. You need to be more specific than that.

4 Q. In 2018, did you endorse any candidates
5 who ran for a seat on the Virginia Beach City
6 Council?

7 A. Yes.

8 Q. Who?

9 A. Let me think. I've got to remember who
10 was running in 2018.

11 In Centerville, Sabrina Wooten. In the
12 beach district, John Uhrin. In the Bayside
13 district, Louis Jones. Who am I leaving out?

14 MR. BOYNTON: At large.

15 A. At large, Dee Oliver. I did not endorse
16 anyone in the Mayor's race. I believe that's it.
17 Oh. And me.

18 Q. All right.

19 A. Just saying.

20 Q. In the election before that, did you
21 endorse a candidate?

22 A. That's 2016. So Rosemary Wilson, Amelia

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1 Ross-Hammond, Shannon Kane. Let's see. Just
2 going around the table here in my head. I'd have
3 to look at a list on who's on the -- those I
4 remember. Those I know I did.

5 Q. That's fine.

6 A. I'm thinking going around the table who
7 was there. Definitely those that I just told you.

8 Q. Thank you.

9 Have you ever actively opposed a candidate
10 running for City Council in Virginia Beach in 2018
11 or 2016?

12 A. Yes.

13 Q. Who?

14 A. 2016? Well, aside from my opponents --

15 Q. Fair.

16 A. Just trying to think. I don't recall who
17 was running in 2016. It was likely Rick
18 Kowalewitch. I've always opposed him. Let's see.
19 2016-2018, I don't know if they ran. There are
20 some people. I would have to look at a list of
21 who was running.

22 Q. Did you actively --

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1 A. Once it's over, it's out of my head.

2 Q. Did you actively oppose the candidates who
3 ran against Rosemary Wilson, Amelia Ross-Hammond,
4 and Shannon Kane?

5 A. I think it's fair to say that, yes.

6 Q. Did you actively oppose the candidates
7 running against Sabrina Wooten, John Uhrin, Louis
8 Jones, and Dee Oliver?

9 A. I did not actively oppose the candidate
10 running against Louis Jones because he's a friend
11 of mine, but I endorsed Louis Jones.

12 Q. Okay.

13 A. I did actively oppose one of the two
14 candidates running against Sabrina Wooten. And I
15 didn't really oppose any of the candidates in the
16 at large race; I just supported Dee Oliver.

17 Q. Who were the candidates that you opposed
18 that ran against Wooten and Jones?

19 A. So I did not oppose the candidate running
20 against Jones.

21 Q. All right.

22 A. But that person's name is Brad Martin.

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1 And there were three people in the Centerville
2 race, which was Wooten -- and I actively opposed
3 Conrad Schesventer.

4 MR. LAMAR: Do you need it to be spelled?

5 A. And I can't help you with that.

6 Q. Got it.

7 A. I did not oppose the third candidate in
8 that race because I was friendly with him; and his
9 name is Eric Wray.

10 Q. So you didn't oppose Brad Martin and Eric
11 Wray?

12 A. Correct.

13 You know what? Let me go back. I did
14 actively oppose John Moss in the at large race.

15 Q. That was against Sabrina?

16 A. No. At large race, which is --

17 Q. Okay. That was a separate one, right?

18 A. Yeah.

19 Q. Have you ever contributed money to a
20 candidate running for a seat on the Virginia Beach
21 City Council?

22 A. I have.

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1 Q. Between -- since 2010?

2 A. Yes.

3 Q. Who?

4 A. I'd have to look at the list. I believe I
5 gave you that in the deposition or the subpoena.

6 Q. I think that's right.

7 (Exhibit 1 was marked and
8 attached to the transcript.)

9 Q. Let the record reflect that the -- that I
10 just handed you Exhibit 1. And this is the --
11 what appears to be a screenshot of vpap.org; is
12 that correct?

13 A. Yes.

14 Q. Do you see the circle?

15 A. Yes.

16 Q. Are you indicating that your contribution
17 was from the Independence Boulevard Professional
18 Center or the Shore-Urchin?

19 A. Both.

20 Q. Both.

21 What is the Independence Boulevard
22 Professional Center?

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1 A. It's just an office building.

2 Q. All right. And what is Shore-Urchin?

3 A. It is also an office building.

4 Q. What's your affiliation with those office
5 buildings?

6 A. I'm a managing member of the LLCs for both
7 of them.

8 Q. What is Mr. Sherrod's race?

9 A. African American.

10 Q. Did Mr. Sherrod win his election?

11 A. Did he run his election?

12 Q. Did he win?

13 A. No, he did not.

14 Q. That's it for that one.

15 Was there anyone else you remember?

16 A. Again, you should have that documentation.
17 I don't recall them right off the top of my head.

18 Q. Not a problem.

19 (Exhibit 2 was marked and
20 attached to the transcript.)

21 Q. So let the record reflect that the court
22 reporter has handed you Exhibit 2, which appears

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1 to be a screen -- I guess a screenshot from the
2 contributions to the Rosemary Wilson -- I'm
3 sorry -- the Amelia Ross-Hammond -- Friends of
4 Ross-Hammond Campaign Committee record?

5 A. It is a screenshot from the State Board of
6 Elections - Campaign Finance Reporting Page. And
7 it does, in fact, have Friends of Ross-Hammond on
8 it.

9 Q. And that's your name at the bottom; Wood,
10 Jim?

11 A. That is me.

12 Q. Was that made on your behalf or on behalf
13 of Ocean Bay Contracting?

14 A. She listed it as me, so it must have been
15 a personal check from me. Again, I don't recall.

16 Q. Is Ocean Bay Contracting another one of
17 your enterprises?

18 A. Yes.

19 Q. These are the only contributions that we
20 saw from -- that you produced since 2010. Were
21 there any other financial contributions to a
22 candidate running for City Council election since

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1 2010?

2 A. I don't recall what your question was.
3 What I did was I provided you with the
4 documentation you requested. If you are asking me
5 to search for every Council candidate, if that was
6 not your question then I don't know if this is all
7 of it.

8 Q. So, yeah, do you recall any other
9 contributions that you've made to candidates for
10 City Council elections?

11 A. Yes.

12 Q. Who else?

13 A. I've contributed to Rosemary Wilson's
14 campaign. And I've contributed to Shannon Kane's
15 campaign.

16 Q. Do you remember when?

17 A. I do not.

18 Q. Would you say it was after 2010?

19 A. No. I don't know.

20 Q. That was Rosemary Wilson and Shannon Kane?

21 A. Shannon Kane.

22 Q. Have you ever volunteered for the campaign

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1 of a candidate running for a City Council election
2 since 2010?

3 A. Yes.

4 Q. Who?

5 A. Prescott Sherrod, Amelia Ross-Hammond,
6 Rosemary Wilson, Shannon Kane. Since 2010, I
7 think that's it. Maybe Ron Villanueva.

8 Q. Have you ever put a sign up in your yard
9 for a candidate running for City Council elections
10 since 2010?

11 A. No, I have not.

12 Q. Did you make any contributions for
13 Virginia State Senate races since 2010?

14 A. I don't recall.

15 Q. So we have one.

16 So this campaign contribution was from
17 2009, not since 2010. And this is also from your
18 Rule 45 subpoena.

19 (Exhibit 3 was marked and
20 attached to the transcript.)

21 Q. Let the record reflect that the court
22 reporter has handed you Exhibit 3, which is a

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1 screenshot of the Virginia Public Access Project
2 indicating that you made a \$500 donation to
3 Villanueva for Delegate - Ron; is that correct?

4 A. Yes.

5 Q. Do you know if you made any other campaign
6 contributions for Virginia state elections?

7 A. I believe I did.

8 Q. Do you remember who those contributions
9 were to?

10 A. I don't recall specific. I suspect that
11 they were to -- I don't remember.

12 Q. Okay. Did you provide any other support
13 to any other Virginia Beach City Council
14 candidates or Virginia state candidates?

15 A. Yes.

16 Q. What was that support?

17 A. Gave them sign locations.

18 Q. What's a sign location?

19 A. So you had asked about putting a sign in
20 my front yard. They also have -- in addition to
21 yard signs, they have larger signs, four-by-four,
22 four-by-eight signs. And I gave some candidates

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1 the permission to put them on commercial
2 properties that we own.

3 Q. Okay. Any other support?

4 A. Working the polls.

5 Q. What does working the polls mean?

6 A. Standing out in front of a polling place
7 and handing out literature advertising a
8 particular candidate.

9 Q. Anything else?

10 A. Can you repeat what you just said?

11 Q. Any other support?

12 A. Attending events, and things like that.

13 Q. When you were saying earlier that you were
14 working the polls, did you -- were you standing in
15 front of the polls supporting a candidate other
16 than yourself?

17 A. Yes.

18 Q. All right. Do you remember who those
19 candidates were?

20 A. So in 2018 I handed out a sample ballot
21 that the Virginia Beach Education Association had.
22 That had my name on it. It had John Uhrin, Aaron

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1 Rouse, Sabrina Wooten, Louis Jones. I don't
2 remember the others.

3 In 2016 I likely handed out the same
4 document. And that was for Rosemary Wilson
5 primarily. But I know the other endorsed people
6 at that time were also Shannon Kane and Amelia
7 Ross-Hammond.

8 Q. Okay. When you said the same document,
9 you mean it came from the same, Virginia Beach --

10 A. Virginia Beach Education Association, yes.

11 Q. You said the other support was attending
12 events?

13 A. Yes.

14 Q. What kind of events?

15 A. Fundraising events.

16 Q. Do you recall where those fundraising
17 events were?

18 A. Not all of them.

19 Q. Can you tell me about the ones you do
20 recall?

21 A. There would be cocktail parties at the
22 Town Center City Club. There would be kickoff

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1 events at various people's offices, at the Westin
2 Hotel. I don't recall other specific locations.

3 Q. Did you attend an event for a specific
4 Council member running -- a specific candidate
5 running for a Council seat in 2018?

6 A. Yes.

7 Q. Who?

8 A. Me.

9 Let me think. Who else? Ben Davenport,
10 Dee Oliver, Sabrina Wooten. Those are the only
11 ones I recall right now.

12 Q. Did you attend any for Aaron Rouse?

13 A. I attended a number there, and Aaron Rouse
14 attended. I do not believe I attended specific
15 Aaron Rouse events.

16 Q. Okay. How long have you lived in Virginia
17 Beach?

18 A. 1964, '65.

19 Q. Between 1964 and 1965, would you say the
20 minority population in Virginia Beach has grown?

21 A. Between the years 1964 and '65?

22 Q. Until today. I'm sorry.

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1 Between 1964 and '65 and today, would you
2 say the population of Virginia Beach -- the
3 minority population of Virginia Beach has grown?

4 MR. BOYNTON: And I'm just going to impose
5 a general objection as to him not having expertise
6 on this. I assume if he has a personal -- you
7 know, personal belief based on observations, I
8 guess he can answer.

9 MR. LAMAR: That's all I'm asking. I'm
10 not asking for --

11 A. Yes.

12 MR. BOYNTON: Do you want to take a break?

13 THE DEPONENT: I've got to grab this.

14 MR. BOYNTON: Let's take a break.

15 MR. LAMAR: Okay.

16 (A recess was taken.)

17 Q. So I believe the last question I asked you
18 was that between -- when you first moved to
19 Virginia Beach and today, you would agree that the
20 minority population in Virginia Beach has grown?

21 A. Yes.

22 Q. To the extent that --

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1 MR. BOYNTON: Personal knowledge or
2 information, not expertise.

3 Q. Would you say that minorities in Virginia
4 Beach tend to live close to each other?

5 MR. BOYNTON: Same objection. An
6 additional objection as to vagueness as to what
7 close together means. If you want to rephrase,
8 you can.

9 Q. Did you understand the question?

10 A. I did, but -- well, no. I don't know what
11 you really mean by close together. That's what's
12 confusing to me.

13 Q. Would you say the minority population in
14 Virginia Beach live within -- would you say that
15 the minority communities in Virginia Beach tend to
16 live closer together relative to their proximity
17 to majority communities?

18 A. No.

19 Q. Are there any neighborhoods in the city
20 you would classify as predominantly black?

21 A. Not any longer, no.

22 Q. What neighborhoods do you think used to be

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1 predominantly black?

2 A. I would say Seatack and Western Bayside
3 used to be predominantly African American;
4 however, from my perspective and from campaigning
5 it's very clear that most neighborhoods in
6 Virginia Beach are racially diverse to various
7 degrees.

8 Q. Are there any neighborhoods you would
9 classify as primarily Latino?

10 A. I don't know.

11 Q. Are there any neighborhoods in the city
12 you would classify as predominantly Asian?

13 A. No. Not really.

14 Q. I want to take a step back really quickly
15 about the support you provided for the candidates
16 you were mentioning about, like, working the
17 polls, the sign locations, and attending events.
18 When you were providing this support, did the
19 candidates -- well, like, for example, did Sabrina
20 Wooten ask you for any support?

21 A. Did she ask me for support?

22 Q. Uh-huh.

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1 A. No. She did not personally ask me for
2 support.

3 Q. Did someone from her campaign ask you for
4 support?

5 A. Yes.

6 Q. All right. Did Rosemary Wilson ask you
7 for support?

8 A. Yes.

9 Q. Did Amelia Ross-Hammond ask you for
10 support?

11 A. No. Well, yeah, she did. Yes, she did.

12 Q. Okay. Did Shannon Kane ask you for
13 support?

14 A. Yes.

15 Q. Did Dee Oliver ask you for support?

16 A. Yes.

17 Q. Did Louis Jones ask you for support?

18 A. Yes.

19 Q. Did John Uhrin ask you for support?

20 A. No.

21 Q. Did Aaron Rouse ask you for any support?

22 A. No.

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1 Q. Did Prescott Sherrod ask you for any
2 support?

3 A. Yes.

4 Q. Did Ron Villanueva ask you for any
5 support?

6 A. Yes.

7 Q. I'm going to ask you a couple questions
8 about the redistricting process of 2011-2012.

9 A. Okay.

10 Q. Following the 2010 census the Virginia
11 Beach -- the City of Virginia Beach was
12 redistricted into seven residency districts; is
13 that correct?

14 A. Yes.

15 Q. And you were a City Council member at that
16 time?

17 A. Yes.

18 Q. In your role as a City Council member,
19 were you involved in any way in the redistricting
20 process?

21 A. Just on the perimeter of it. Not really
22 directly involved.

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1 Q. How so?

2 A. I just kept up with where the lines were
3 moving around, honestly, to make sure that I was
4 safely within the same district I was in, and then
5 just looking at what the potential changes were.

6 Q. Do you know what, if any, criteria the
7 city prioritized in redrawing the districts?

8 A. I do not.

9 Q. Do you know if data on the race of
10 Virginia Beach residents were used?

11 A. I believe so.

12 Q. Do you know how so?

13 A. I do not.

14 Q. Do you know what Section 2 of the Voting
15 Rights Act is?

16 MR. BOYNTON: I'm going to object to the
17 form of the question. I think you're asking him a
18 legal opinion. Maybe rephrase.

19 Q. Have you heard of the Voting Rights Act?

20 A. I have.

21 Q. Do you know what the Voting Rights Act is?

22 MR. BOYNTON: Same objection, but he can

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1 answer as to his own understanding.

2 A. I don't think I could give you an educated
3 answer on it.

4 Q. Do you know if compliance with Section 2
5 of the Voting Rights Act was a factor that was
6 considered by the City Council when redrawing the
7 districts?

8 A. I do not know.

9 Q. Do you know which Council members were
10 most involved in the redistricting process?

11 A. Yes.

12 Q. Who?

13 A. Louis Jones.

14 Q. Just Louis Jones?

15 A. Yes.

16 Q. Okay. Were you involved in the hiring of
17 any consultants to help with redistricting?

18 A. To the extent that consultants were hired,
19 then, yes, I was part of the funding mechanism.

20 Q. Did you have any conversations with anyone
21 regarding the redistricting process?

22 A. I don't recall.

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1 Q. Do you know who Kimball Brace is?

2 A. That sounds familiar, but no.

3 Q. Do you know what Mr. Brace's role in the
4 redistricting process was?

5 A. I don't know who that is.

6 Q. All right. What is your understanding of
7 what this lawsuit is about?

8 A. My understanding is that it's an attempt
9 to change the voting structure in Virginia Beach.

10 Q. Have you had any conversations with any
11 current members about changing to a
12 district-based, rather than an at large, election
13 system?

14 MR. BOYNTON: I'm going to interpose an
15 objection here: One, to the extent it goes into
16 possible, you know, settlement discussions; and
17 two, to the extent it goes into legislative
18 privilege. And based on the privilege aspect, I'm
19 just going to ask him to not answer to the extent
20 he gets into either of those areas.

21 A. So would you restate the question?

22 Q. Have you had any conversations with any

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1 current City Council members about changing to a
2 district-based, rather than at large, election
3 system, outside the context of legislative
4 privilege?

5 MR. BOYNTON: Or settlement.

6 Q. Or settlement?

7 A. Outside of those two, no.

8 Q. Have you had any conversations with any
9 former City Council members about changing to a
10 district-based, rather than an at large, election
11 system?

12 MR. BOYNTON: Same objections as to those
13 two areas.

14 A. It would be the same response. No.

15 MR. HEBERT: If I could just interject
16 here. Since he is now asking a different question
17 than the one before about conversations that he
18 has had with former members, legislative privilege
19 wouldn't apply unless it involved conversations
20 about when they were on the Council. These are
21 people who are non-Council members being --
22 conversations. So with that clarification --

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1 MR. BOYNTON: I understand your point. I
2 don't think it changes the answer.

3 MR. HEBERT: It may not, but I want to
4 make sure that it doesn't.

5 A. My conversations with former members would
6 have been when they were current members.

7 MR. HEBERT: Thank you.

8 Q. Have you had any conversations with the
9 current Mayor of Virginia Beach about changing to
10 a district-based, rather than an at large,
11 election system?

12 MR. BOYNTON: Same objections.

13 A. Outside of that context, no.

14 Q. Any conversations with any former Mayor of
15 Virginia Beach about changing to a district-based,
16 rather than an at large, election system?

17 MR. BOYNTON: Same objections as to the
18 time they were Mayor or Council member.

19 A. Other than when they were on the body, no.

20 Q. Have you ever had any conversations with
21 anyone else about changing to a district-based,
22 rather than an at large, election system for City

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1 Council seats --

2 A. Yes.

3 Q. -- outside of attorney-client privilege?

4 A. Yes.

5 Q. Who?

6 A. It has been a topic during elections, and
7 it has been a topic that people have brought up
8 during various meetings at the city.

9 Q. Do you remember who you were having those
10 conversations with?

11 A. So one I recall in 2018 was at a Civic
12 League forum, and it was mentioned, and various
13 people were asking positions on -- candidates'
14 positions on this. And, then, we've had a number
15 of people to come speak at our open dialogue at
16 the city and some advocate for, some advocate
17 against. But if you're asking me specific names,
18 I'm sorry, I don't remember.

19 Q. Do you think the city should change its
20 method of electing City Council members?

21 A. I do not.

22 Q. Do you vote in City Council elections?

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1 A. Do I vote in City Council? Yes.

2 Q. Why do you think the current system should
3 not be changed?

4 MR. BOYNTON: I'm going to interpose an
5 objection here. I think he said what his position
6 is, which is a potential political position. His
7 reasoning gets, I think, into all the things we're
8 talking about in terms of legislative privilege,
9 in terms of attorney-client communications and
10 possible settlement discussions. So I'm not going
11 to let him answer the question.

12 MR. HEBERT: Let me interject again then.
13 He already said that he didn't think the current
14 system should be changed. We're now entitled to
15 know why he holds that opinion. It's a personal
16 opinion of his. It doesn't bind anybody, other
17 than him, as to his opinion.

18 MR. BOYNTON: I still think it gets into
19 the type of province that is inappropriate for a
20 deposition, where it's either formed as part of
21 the legislative process of just making a decision
22 and/or the attorney-client realm or in the work

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1 product realm of settling the case. But I will
2 allow him to answer.

3 MR. HEBERT: Thank you.

4 A. So I'm sorry. Counsel going back and
5 forth. So ask the question again, please.

6 Q. Why do you think that the city should not
7 change its method of electing City Council
8 members?

9 A. I think it dilutes the vote -- the
10 influence that the voters have on city government.

11 Q. In which residency district in Virginia
12 Beach do you currently live?

13 A. Lynnhaven.

14 Q. Have you ever lived in any other residency
15 district in Virginia Beach?

16 A. No.

17 Q. Did you know Sabrina Wooten before she ran
18 for City Council?

19 A. No.

20 Q. How long have you known her?

21 A. Eighteen months, maybe.

22 Q. Had you ever heard of her before she ran

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1 for City Council?

2 A. Heard of her? Yes.

3 Q. You supported her candidacy for City
4 Council, correct?

5 A. Yes.

6 Q. And you endorsed her candidacy; is that
7 correct?

8 A. Yes.

9 Q. Do you know if she received support from
10 any other Council members?

11 A. Yes.

12 Q. Who?

13 A. Rosemary Wilson. And I don't know about
14 others, but I do know Rosemary Wilson.

15 Q. Why do you think Rosemary supported her
16 candidacy?

17 A. I do not know.

18 Q. Did you know Aaron Rouse before he ran for
19 City Council?

20 A. No.

21 Q. Had you ever heard of Aaron Rouse before
22 he ran for City Council?

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1 A. No.

2 Q. Did you support his candidacy for City
3 Council?

4 A. No.

5 Q. Did you endorse his candidacy?

6 A. No.

7 Q. Do you know if he received any support
8 from any other Council members?

9 A. I do not know.

10 Yes, he did. Yes, he did. Ben Davenport.

11 Q. Ben Davenport was a --

12 A. He was a Council member.

13 Q. -- Council member when he supported Aaron
14 Rouse?

15 A. Yes.

16 Q. Have any Latino candidates ever been
17 elected to City Council?

18 A. Yes.

19 Q. Who?

20 A. Rita Bellitto.

21 Q. Anyone else?

22 A. I don't know. I just know her for sure.

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1 Q. Was that candidate reelected to City
2 Council?

3 A. She was appointed, and then she was
4 elected. And she was the highest vote-getter.

5 Q. All right. Did she run for reelection
6 after she was elected?

7 A. She resigned because she moved, so I don't
8 know how many times she actually was on the
9 ballot.

10 Q. Okay.

11 A. But she was also a School Board member
12 popularly elected, as well.

13 Q. What year was that?

14 A. I don't know.

15 Q. Was it in the last 10 years?

16 A. I don't know.

17 Q. Do you know when she moved?

18 A. I do not know.

19 Q. Do you know the decade that she was on the
20 City Council?

21 A. You know, I'd have to go back and look,
22 but it's all public record. You-guys can find it

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1 very easily.

2 Q. Have any Asian candidates ever been
3 elected to the City Council?

4 A. Yes.

5 Q. Who?

6 A. Ron Villanueva.

7 Q. Did you support Ron Villanueva's
8 candidacy?

9 A. Yes.

10 Q. Was Ron Villanueva reelected to City
11 Council?

12 A. Yes.

13 Q. Do you know how many times?

14 A. 2002, 2006. What year was this?

15 Q. 2009.

16 MR. BOYNTON: That's when he's
17 transitioning.

18 A. So 2002 and 2006 he won. And, then, I
19 guess he resigned, went to the General Assembly
20 where I supported him there, as well.

21 Q. All right. Okay. Now I'm going to change
22 the subject to the Virginia Beach City Council

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1 meeting. Did the City Council hold a meeting on
2 August 27th, 2019?

3 A. Yes.

4 Q. Was this a workshop meeting?

5 A. May I look at my calendar?

6 Q. Yeah. Sure.

7 A. It was a workshop and a special meeting.

8 Q. Remind me again, what is a workshop
9 meeting?

10 A. A workshop is a meeting where there are
11 various briefings and discussions but there are no
12 votes.

13 Q. Okay. What do you recall about that
14 meeting?

15 A. I'd have to look at the agenda and see
16 what we talked about.

17 Q. Do you think the -- do you recall a
18 Mr. Arnette Heintze being there?

19 A. Yes.

20 Q. Who is that?

21 A. He's the CEO of Hillard Heintze, which is
22 an organization that is doing the independent

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1 review on the May 31st mass shooting.

2 Q. Did he speak at the -- do you recall him
3 speaking at the August 27th --

4 A. I do.

5 Q. And you recall him being present at the
6 meeting, as well, I presume?

7 A. Yes.

8 Q. Do you remember the subject matter that he
9 discussed?

10 A. Yes. He was giving a briefing on the --
11 their progress to-date.

12 Q. All right. Do you recall at that meeting
13 you expressed concern that the investigation into
14 the mass shooting on May 31st could be "hijacked"
15 by outside groups?

16 A. My exact question -- my exact phrasing was
17 I believe that there had been a newspaper article
18 where the City Auditor stated he thought that
19 outside groups were attempting to hijack the
20 investigation. And I asked Mr. Heintze that
21 question.

22 Q. Did you believe that there are outside

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1 groups or individuals that were attempting to
2 hijack the investigation?

3 A. One second.

4 (Attorney-client discussion)

5 A. I'm sorry. Please restate.

6 Q. Did you believe there were outside groups
7 or individuals that were attempting to hijack the
8 investigation?

9 A. I don't have any knowledge of that either
10 way.

11 Q. You said the City Auditor -- you said
12 there was a newspaper article that stated that the
13 City Auditor believed that there were outside
14 groups that were attempting to hijack the
15 investigation; is that correct?

16 A. Correct.

17 Q. Why do you think the City Auditor believes
18 that there are outside groups attempting to --

19 MR. BOYNTON: I object to the form of the
20 question. He already said he doesn't know. Asked
21 and answered.

22 Q. What groups do you think --

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1 MR. HEBERT: Excuse me. I think -- the
2 question was different. The objection may be the
3 same. But he asked him earlier if he -- if he had
4 an opinion with regard to whether or not outside
5 groups were attempting to hijack. And he said, I
6 don't -- basically, I don't have any information
7 about that.

8 Is that correct, Mr. Wood?

9 A. I believe that's what I said.

10 MR. HEBERT: Then this question was
11 different. This question was do you know why the
12 Auditor had the opinion or stated that opinion.

13 MR. BOYNTON: Okay. I mean, he can answer
14 that.

15 MR. HEBERT: He may not know. I just
16 wanted to clarify that it was a different question
17 than --

18 A. So the information I got was from the
19 newspaper article. In the newspaper article it
20 seemed pretty clear that he had that opinion based
21 on meetings.

22 Q. Did the newspaper article indicate which

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1 outside groups or individuals that the City
2 Auditor was concerned about?

3 A. He said it was some ministers group. I
4 don't recall the specific name of the
5 organization.

6 Q. Was it the Virginia Beach
7 Interdenominational Ministers Conference?

8 A. Again, I don't know the exact name.

9 Q. Okay. Do you know what the Virginia Beach
10 Interdenominational Ministers Conference is?

11 A. I believe that -- if that's the same
12 group -- again, I'm not focused on the names. I
13 know individuals who are members of various
14 groups, but I don't pay attention to what their
15 name is.

16 Q. All right.

17 MR. BOYNTON: I want to put on the record
18 here, does your organization represent the
19 Interdenominational Ministers Conference or Gary
20 McCollum?

21 MR. LAMAR: Say your question one more
22 time.

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1 MR. BOYNTON: You're asking him a series
2 of questions about the Interdenominational
3 Ministers group. You've also, in discovery,
4 asserted attorney-client privilege on a memo one
5 of your attorneys sent to Gary McCollum. I'm
6 trying to understand, do you take the position in
7 this case that you represent Gary McCollum
8 personally or the Virginia Beach
9 Interdenominational Ministers Conference
10 generally?

11 MR. HEBERT: Well, let me just say I don't
12 think a deposition is the proper forum to put
13 things on the record like this, Chris, but we do
14 not represent the Ministers Conference as a
15 client, but we did at one point serve as counsel
16 to Mr. McCollum.

17 MR. BOYNTON: In the case -- in this case?

18 MR. HEBERT: Not in this -- he is not a
19 party to this case. And just because he's not a
20 party to this case doesn't mean that a legal
21 relationship and an attorney-client -- legal
22 counsel capacity ends or starts.

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1 MR. BOYNTON: We can take up the rest of
2 that off the record.

3 MR. HEBERT: Okay.

4 Q. You want me to repeat the question?

5 A. I thought --

6 MR. BOYNTON: He's already answered it.

7 Can I talk to him for a minute?

8 MR. LAMAR: Sure.

9 (A recess was taken.)

10 (Exhibit 4 was marked and
11 attached to the transcript.)

12 Q. All right. So, Mr. Wood, I'm handing you
13 what has been marked Exhibit 4 by the court
14 reporter. What is it?

15 A. This is the Virginia Beach AAPAC Candidate
16 Questionnaire from 2018.

17 Q. What is the AAPAC?

18 A. The African American Political Action
19 Council.

20 Q. Could you turn to question 25, please?

21 A. So the question reads, "In light of press
22 reports concerning the current City Manager,

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1 please state your position as to the City
2 Council's role in investigating, reprimanding, and
3 terminating appointed city leaders. What do you
4 believe should have taken place with Dave Hansen -
5 should he have been reprimanded? Terminated? Or
6 were the complaints against him not a factor in
7 deciding his employment status?"

8 Do you see that question?

9 A. I do.

10 Q. Can you read your answer, please?

11 A. "I won't reveal personnel matters, but I
12 believe the City Manager is doing many things well
13 and I am confident that going forward he will meet
14 our professional standards in all phases of his
15 job."

16 Q. Thank you.

17 Can you turn to the next page? I'm sorry.
18 The next page after that. What is this?

19 A. It's the same thing.

20 Q. Next page. I'm sorry.

21 A. It's an email.

22 Q. Is this you emailing the AAPAC

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1 questionnaire to James Allen?

2 A. Yes.

3 Q. Who is James Allen?

4 A. He had something to do with the AAPAC. I
5 don't know what his position is.

6 Q. And do you see the date on this is October
7 26th, 2018?

8 A. Yes.

9 Q. Would you say that Mr. Allen is a leader
10 in the black community?

11 A. Yes. Sure.

12 Q. What was the Faith, Freedom and Justice
13 March?

14 A. I don't know what that is. Was it called
15 something else?

16 Q. It was called the Faith, Freedom and
17 Justice March.

18 Do you recall protestors calling for the
19 city to fund a disparity study?

20 A. Yes.

21 Q. Do you recall there being a march that
22 happened sometime in 2017?

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1 A. Yes.

2 Q. At that time when the march happened --
3 does February 2017 sound about right to you?

4 A. I knew it was that timeframe, but I don't
5 know exactly when.

6 Q. Right. Okay.

7 At that time did you believe a disparity
8 study was necessary?

9 A. I believe so.

10 Q. Prior to the disparity study did you
11 believe there was a disparity in the city
12 contracts awarded to the minority-owned
13 businesses?

14 A. So that's a question that's both legal
15 and -- and opinionated.

16 MR. BOYNTON: I'm asking you not to answer
17 legally. You can answer to your personal
18 understanding.

19 A. So, in my opinion, I think that we had not
20 reached a goal we should have.

21 Q. Do you know who organized that march?

22 A. I thought it was George Minns, but I'm not

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1 sure.

2 Q. Do you recall anyone else organizing that
3 march?

4 A. I don't know who organized it. I just
5 know George Minns was there.

6 Q. Okay.

7 (Exhibit 5 was marked and
8 attached to the transcript.)

9 MR. BOYNTON: Are you asking him to review
10 it?

11 Q. Did you get a chance to review the
12 exhibit?

13 A. Yes.

14 Q. I'm handing you what has been marked
15 Exhibit 5 by the court reporter. Have you seen
16 this document before?

17 A. Yes.

18 Q. What is it?

19 A. It's a letter from Dr. Allen and the
20 Virginia Beach Interdenominational Ministers
21 Conference dated August 12, 2019.

22 Q. The letter was sent to you, Mayor Dyer,

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1 and the rest of the City Council on August 12th,
2 correct?

3 A. Yes.

4 Q. What is your understanding of the content
5 of this letter?

6 A. Mr. Allen did not like the City Manager
7 and wanted him terminated.

8 Q. You'd agree there are some pretty serious
9 accusations in this letter?

10 A. I would agree there are accusations in
11 this letter, yes.

12 Q. So the Virginia Beach Interdenominational
13 Ministers Conference called for Mr. Hansen to be
14 terminated from his position, correct?

15 A. Yes.

16 Q. What do you think prompted this letter?

17 MR. BOYNTON: Object to the form of this
18 question. It calls for speculation.

19 Q. Why do you think the Virginia Beach
20 Interdenominational Ministers Conference wrote
21 this letter and delivered it to the City Council?

22 MR. BOYNTON: Same objection.

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1 You can answer if you know their motives.

2 A. I have no idea.

3 Q. So let's start at the second paragraph on
4 the first page. It states, "We have watched
5 Mr. Hansen's behavior, comments, and lack of
6 leadership over the last three years. In any
7 other reputable organization or major corporation
8 managing billions of dollars, a fraction of
9 Mr. Hansen's actions would have been ample
10 justification for termination. We have reached
11 out to him, wrote to him, met with him, and
12 despite our outreach efforts his performance has
13 only deteriorated."

14 Why do you think the Virginia Beach
15 Interdenominational Ministers Conference believed
16 Mr. Hansen's actions justified termination?

17 MR. BOYNTON: Same objection. The letter
18 speaks for itself, but you're asking for him to
19 infer motives of somebody else.

20 Q. Do you think any of the claims made in
21 this letter are true?

22 A. Well, I think they probably watched him

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1 for three years. And he did insult Aubrey Layne.

2 Q. I'm sorry. Go ahead. Continue.

3 A. Those two things, I think, are accurate.

4 Q. Is there anything else you think is
5 accurate?

6 A. I think there are things in here that are
7 inaccurate, but no.

8 Q. All right. Who is Aubrey Layne?

9 A. Aubrey Layne is the current Secretary of
10 Finance for the Commonwealth of Virginia.

11 Q. Is it true that Mr. Hansen threatened to
12 punch Mr. Layne in the face?

13 A. He made a comment about punching him in
14 the face. I don't know that I would characterize
15 it as a threat.

16 Q. Do you know when this text message was
17 sent?

18 A. Roughly.

19 Q. Can you give me, like, an approximation?
20 Was it 2017?

21 A. It was 2016-2017 after the light rail
22 referendum failed.

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1 Q. Do you know when this communication became
2 publicly known?

3 A. I do not.

4 Q. When did you find out about it?

5 A. I don't remember.

6 Q. Would you say it was this year, the
7 previous year?

8 A. Whenever it became publicly available. I
9 don't know.

10 Q. All right. Does March 2018 sound about
11 right?

12 A. Again, I don't know, but...

13 Q. So when you found out about this, were you
14 confident going forward that Mr. Hansen wouldn't
15 meet the professional standards in all phases of
16 his job?

17 MR. BOYNTON: Are you asking at the moment
18 in time he learned of this particular incident or
19 at the time he filled out the AAPAC questionnaire
20 or some other time?

21 MR. LAMAR: I'm asking when he found out
22 about the communications that Mr. Hansen

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1 communicated that he wanted to punch Mr. Layne in
2 the face.

3 Q. Did you believe Mr. Hansen was capable of
4 meeting the professional standards in all phases
5 of his job?

6 A. Did I believe -- yes. I believe he was
7 capable of it, yes.

8 Q. So let's move to the second page of this
9 letter. So in that first paragraph there were
10 some allegations that -- it states that, "From
11 press reports you are aware of the laundry list of
12 management, leadership, and communication blunders
13 Mr. Hansen has made over the last few years.
14 Insulting Aubrey Layne, a member of the Governor's
15 cabinet, communicating with developers prior to
16 ensuring all Council persons were informed about
17 economic development initiatives..."

18 What do you think that portion of the
19 paragraph refers to?

20 A. I have absolutely no idea.

21 Q. You have no -- so you have no idea what
22 this refers to or when it took place?

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1 A. Yes. To both of those questions, I don't
2 know.

3 Q. So today is your first time hearing about
4 this allegation?

5 A. No. I got the letter.

6 Q. Okay. So when you got the letter, was
7 that the first time you heard about this
8 allegation?

9 A. It is a vague statement. There were no
10 specifics in there. So I, basically, ignored it
11 absent information that is specific.

12 Q. So when you read that sentence you had no
13 inclination as to what the letter was referring
14 to?

15 A. In that particular sentence, correct.

16 Q. All right.

17 MR. BOYNTON: And you've asked him about
18 one particular clause of that sentence. I want to
19 be specific as to the record on that.

20 MR. LAMAR: Okay.

21 Q. So the next clause in that sentence reads
22 that Mr. Hansen participating in racially

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1 sensitive text messages with city employees about
2 this organization and other marchers during the
3 2017 Faith, Freedom and Justice March.

4 What do you think that refers to?

5 A. That probably refers to the text message
6 exchange between Deputy City Manager Ron Williams
7 and City Manager Dave Hansen.

8 Q. Do you recall when you found out about
9 this incident?

10 A. I do not.

11 Q. Do you have an approximation when this
12 happened?

13 A. When --

14 Q. When you found out about this incident?

15 A. No.

16 Q. Prior to Mr. Hansen's resignation, were
17 you confident he would meet all the professional
18 standards of his job?

19 A. Yes.

20 Q. Actually, I want to take a step back real
21 quickly.

22 MR. BOYNTON: He thought he was done.

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1 Q. Do you know who Bruce Smith is?

2 A. Yes.

3 Q. Would you consider Mr. Bruce Smith to be a
4 leader in the black community?

5 A. I don't know. I'm not a member of the
6 black community, so I do not know.

7 Q. Do you think Mr. Bruce Smith is a member
8 of the black community -- is a leader of the black
9 community? Sorry.

10 A. Again, I don't know. I know he's a very
11 successful businessman.

12 Q. How do you communicate with other Council
13 members?

14 A. Telephone.

15 Q. Do you ever text other Council members?

16 A. Rarely.

17 Q. You said you rarely text your
18 constituents, as well?

19 A. They, generally, don't have my cellphone
20 number. And it's, generally, in emails. And we
21 have a Council retention thing which makes it a
22 lot easier. So I make sure all the documents are

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1 available. So I ask people to email whenever
2 possible.

3 Q. Okay. What email do you request that they
4 use?

5 A. My vbgov email address.

6 Q. Do you use any other email addresses?

7 A. No. Not for city-related things, no.

8 Q. Do you discuss city business with other
9 Council members through texts?

10 A. Rarely.

11 Q. Do you remember if you discussed this case
12 with other Council members via text message?

13 A. I have not.

14 Q. Did you produce any of the relevant text
15 messages to plaintiffs?

16 MR. BOYNTON: Object to the form of the
17 question. It assumes there are relevant or
18 responsive text messages.

19 Q. Are there any relevant or responsive text
20 messages? Do you possess any relevant or
21 responsive text messages?

22 MR. BOYNTON: Again, I'd also ask,

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1 responsive to what?

2 Q. When you received the subpoena, did you
3 also search your text messages to determine
4 whether or not your text messages contained
5 responsive documents?

6 A. Yes.

7 Q. Did you find any responsive documents?

8 A. Yes.

9 Q. Did you produce those?

10 A. Yes.

11 Q. What were they?

12 A. Do you have my --

13 MR. BOYNTON: Again, you have the
14 response. But I'm happy to put in front of him a
15 copy of the full response to the subpoena, and he
16 can sift through it and tell you which ones are
17 text messages.

18 MR. LAMAR: Thank you.

19 A. Attachment A is a text message. Just
20 Attachment A.

21 MR. HEBERT: May I look at that?

22 MR. BOYNTON: You can, as long as I get it

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1 back.

2 MR. HEBERT: Of course you will.

3 Q. Who is Dee?

4 MR. BOYNTON: Before we get there, let's
5 put on the record what we're looking at.
6 Mr. Lamar has asked a series of questions of
7 Mr. Wood relating to his -- Mr. Wood's response to
8 a subpoena duces tecum Rule 45 subpoena. I put a
9 copy in front of him of his complete response so
10 he could answer those questions.

11 MR. HEBERT: Thank you.

12 MR. BOYNTON: What's the question?

13 MR. LAMAR: I was asking who was Dee?

14 A. Dee Oliver, who was a candidate for
15 Council.

16 Q. Did you discover why there were different
17 colors for the sample ballots?

18 A. Did I personally discover why? No.

19 Q. Do you know if anyone else discovered why
20 there were different colors for the sample
21 ballots?

22 A. I am told that two individuals witnessed

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1 poll workers handed out different colors of
2 ballots to people of different races.

3 Q. In looking at your document here, do you
4 know which ones were for different races?

5 MR. BOYNTON: Testify to your knowledge.
6 In other words, don't speculate.

7 A. First off, I can hardly read it.

8 I have no personal knowledge of this. I
9 just was -- I was told by two individuals, and
10 that's it.

11 Q. Just one more question.

12 A. Yes.

13 Q. In the text messages it says Friends of
14 the Elephant. Do you know what Friends of the
15 Elephant is?

16 A. It is a PAC.

17 Q. Does it have a partisan affiliation?

18 A. I personally don't know, but I would
19 speculate that it does.

20 Q. Would that be Republican?

21 A. I can tell you that the elephant is a
22 Republican symbol.

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1 Q. So in the text message it says -- it
2 reads, "She is still here. So all she has is the
3 orange kind of color left."

4 Do you know who the "she" is?

5 A. As I recall, it was a poll worker working
6 for another candidate.

7 Q. Do you know which candidate that was?

8 A. John Moss.

9 Q. You endorsed John Moss in that -- you
10 opposed John Moss in that election, correct?

11 A. Correct.

12 Q. Do you find anything wrong with handing
13 out sample ballots that are two different colors
14 and contain two different pieces of information?

15 A. You need to be a little bit more specific
16 with what your question is.

17 Q. Do you find that there is a problem with
18 organizations passing out sample ballots that
19 contain different information?

20 A. That -- no. They -- not -- not generally,
21 no.

22 Q. What about these specific sample ballots?

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1 A. I don't -- let me -- ask me the question
2 again because I'm -- my head is in two different
3 places here.

4 Q. Do you think organizations passing out
5 these specific sample ballots -- what do you think
6 about organizations passing out these specific
7 sample ballots?

8 A. It's their right to pass out the sample
9 ballots.

10 Q. Is there anything in these sample ballots
11 that you find objectionable or of concern?

12 A. Yes.

13 Q. What is it?

14 A. The fact that one has -- lists several
15 candidates, and the other deletes one candidate
16 off of there.

17 Q. Who is deleted?

18 A. Aaron Rouse.

19 Q. Do you have any information about why
20 Aaron Rouse's name was deleted from one sample
21 ballot?

22 THE DEPONENT: I assume I can respond to

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1 hearsay?

2 MR. BOYNTON: Hearsay, yes. But
3 speculation, no.

4 A. Okay. So hearsay, I heard from two -- two
5 separate poll workers that they observed African
6 American voters receiving one color ballot and
7 non-African American voters receiving another
8 color ballot. Sample ballot, not ballot.

9 Q. And the African American voters received
10 the sample ballot with Rouse's name on it; is that
11 correct?

12 A. The African -- yes. I don't remember
13 which color was which.

14 Q. All right.

15 MR. BOYNTON: Are we done?

16 MR. HEBERT: We are.

17 MR. BOYNTON: You have the right to read
18 and sign this deposition transcript once it is
19 transcribed.

20 You're done.

21 (A discussion took place off the record.)

22

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1 (Signature having not been waived, the
2 deposition of JAMES L. WOOD was concluded at 11:40
3 a.m.)
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ACKNOWLEDGMENT OF DEPONENT

I, JAMES L. WOOD, do hereby acknowledge that I have read and examined the foregoing testimony, and the same is a true, correct, and complete transcription of the testimony given by me and any corrections appear on the attached Errata Sheet signed by me.

(DATE)

(SIGNATURE)

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CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

I, Penny C. Wile, RPR, RMR, CRR, the
officer before whom the foregoing deposition was
taken, do hereby certify that the foregoing
transcript is a true and correct record of the
testimony given; that said testimony was taken by
me stenographically and thereafter reduced to
typewriting under my direction; that reading and
signing was requested; and that I am neither
counsel for, related to, nor employed by any of
the parties to this case and have no interest,
financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my notarial seal this 13th day of
September, 2019.

My commission expires: January 31, 2021.



NOTARY PUBLIC IN AND FOR
THE COMMONWEALTH OF VIRGINIA

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